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UNITED STATES DISTRICT COURT OF CALIFORNIA
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE BRANCH

ELSY GARCIA DE MIRA, individually,
and on behalf of all others similarly situated,

Plaintiff,

vs.

HCR MANORCARE; HCR MANORCARE
MEDICAL SERVICES OF FLORIDA,
LLC; MANOR CARE, INC.; and DOES 1
through 10 inclusive

Defendants.

CASE NO. 12-cv-04092 NJ M

STIPULATION TO EXTEND TIME FOR
PARTIES TO EXCHANGE INITIAL
DISCLOSURES BY ONE WEEK;
[PROPOSED] ORDER

Complaint Filed: August 03, 2012

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28 Attorneys for Plaintiff

Pursuant to Local Rule 16-2 the parties, by and through their respective counsel, stipulate and agree that Plaintiff ELSY GARCIA DE MIRA (“Plaintiff”) and Defendants HCR MANORCARE, INC. (erroneously sued as HCR MANORCARE); HCR MANORCARE MEDICAL SERVICE OF FLORIDA, LLC and MANORCARE, INC. (collectively, Defendants) shall both mutually have an extension of *one week*, or until *October 16, 2012*, to produce and exchange Initial Disclosures pursuant to Federal Rules of Civil Procedure, Rule 26. The Order Setting Initial Case Management Conference requires that Initial Disclosures to be completed by October 9, 2012, but due to the limited availability of counsel and because a modest extension is in the interests of justice, the parties agree to an extension of one week, until October 16, 2012, to complete the exchange.

IT IS SO STIPULATED.

Pursuant to Local Rule 5-1, I, Jennifer L. Connor, obtained concurrence from signatory in filing.

SPIRO MOORE LLP

Date: October 3, 2012

/s/ Jennifer L. Connor
IRA SPIRO
JENNIFER L. CONNOR
DENISE L. DIAZ
JUSTIN MARQUEZ
Attorneys for Plaintiff

Date: October 3, 2012

LITTLER MENDELSON, P.C.

/s/ Arthur M. Eidelhoch
ARTHUR M. EIDELHOCH
AIMEE E. AXELROD
Attorneys for Defendants

[PROPOSED] ORDER

Good cause appearing.

IT IS HEREBY ORDERED that the Order Setting Initial Case Management Conference And ADR Deadlines be modified to continue the deadline for

1. Last day to “complete initial disclosures or state objection in Rule 26(f) Report” from October 9, 2012 to October 16, 2012.

Lucy H. Koh

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